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October 29, 1999
VIA Hand Delivery

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Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket Nos. 981834-TP, 960786-TL

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and 15 copies of the Florida Competitive Carriers Association's Comments on Draft Master Test Plan.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Yours truly,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

- AFA Harvey
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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

Docket No. 981834-TP

In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996.

Docket No. 960786-TL

Filed: October 29, 1999

THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S COMMENTS ON DRAFT MASTER TEST PLAN

The Florida Competitive Carriers Association (FCCA) hereby files its comments on the Draft Master Test Plan (MTP) prepared by KPMG at the Commission's direction.

Procedural History

1. In December 1999, the FCCA and other parties filed a petition asking this Commission to take numerous actions to support local competition. One of the requests was for the initiation of an independent third party test of BellSouth Telecommunications, Inc.'s (BellSouth) operational support systems (OSS). In May 1999, the Commission conducted a workshop to address third party testing. After the workshop, FCCA and AT&T Communications of the Southern States, Inc. (AT&T) filed a motion asking the Commission to initiate a third party test.

2. In Order No. PSC-99-1568-PAA-TP, the Commission ordered that Phase I of such a test be conducted. Phase I required the development of a comprehensive test plan. KPMG was

selected to produce the Master Test Plan. A draft of the plan was distributed to the parties on September 30. Comments on the draft MTP were requested by October 29.

Introduction

3. The FCCA commends the Commission for taking this important step in the process of investigating whether BellSouth's OSS function appropriately and at parity with its retail systems. Only when BellSouth's OSS function at parity can local competition ensue. FCCA was greatly encouraged by the cooperative attitude demonstrated by all parties at the October 15th workshop and looks forward to continuing to work with all parties. FCCA's comments are offered in order to ensure that the third party test is rigorously conducted to help reach the ultimate goal of robust local competition.

GUI

4. To that end, the FCCA emphasizes that it is critical that the test be inclusive. That is, the MTP must be designed so that it analyses *all* OSS used by ALECs, not just selective OSS which some, but not all, ALECs may use. FCCA was very encouraged to learn at the workshop that the GUI will be tested with the same rigor which will be applied to other OSS, such as EDI, OSS '99 and Lens '99. As FCCA pointed out at the workshop, many more carriers use GUI than use EDI. That is because smaller and medium size carriers do not have the resources to develop their own interface. Therefore, it is much more efficient and cost-effective for these carriers to use GUI. This will no doubt be the same experience in Florida.

UNE P

5. FCCA was very encouraged to hear BellSouth representative, Mr. Stacy, acknowledge

that UNE P should be part of the OSS test. As most parties are aware, the FCC press release makes it clear that UNE P must be made available to competitors. Therefore, the UNE P must be an integral part of the third-party test. FCCA believes that testing of the UNE P should be explicitly included in the final MPT.¹

6. As was mentioned at the workshop, when the UNE P became available in New York, the number of orders and the number of customers increased dramatically.

Performance Measures

7. One area of the draft MPT that continues to cause FCCA great concern is the section dealing with performance metrics. Though there was much discussion about this at the workshop, FCCA continues to believe that this is an area of the draft MPT that needs significant clarification. A review of Appendix D (Metrics - Quantitative) describes a number of performance measures which were unilaterally developed by BellSouth.² Contrary to some of the comments made at the workshop, there is no required reporting on these or any other performance measures in Florida. Further, there has not been a Commission docket on performance measures nor is there agreement among the parties as to the appropriate performance measures. It is also critical to note many of the measures state that there is no retail analogue and that such analogue will be developed by BellSouth. KPMG appears to recognize this in its written response to question no. 1 from Rhythms. Rhythms asked

¹Though KPMG reiterated several times at the workshop that it "cannot test what does not exist", there appeared to be agreement that the UNE P would be required by law to be made available and therefore should be tested.

²Mr. Stacy commented that BellSouth will shortly file performance measures in Louisiana. However, as pointed out above, there is currently no performance measure docket open in Florida.

how the performance measures were developed and KPMG responded as follows:

The performance metrics and standards listed in Appendix D were derived with very limited modifications from the original Florida PSC Staff proposal. *The metrics are largely based on what BellSouth currently reports.* KPMG understands that BellSouth is currently developing and will soon make public retail analogs and proposals for benchmarks where these are missing. Input from CLECs on the metrics is welcome, but we cannot promise that all of this input can be incorporated in the test.

Emphasis added. As noted above, there are no reporting requirements in Florida. More importantly, FCCA believes it is wholly inappropriate to rely on "metrics" developed solely by BellSouth and even more inappropriate to rely on "metrics" provided in a state proceeding other than Florida.

8. At the workshop, KPMG commented that the development of performance measures was outside the scope of its assignment and would have to be done by the Staff or the Commission. FCCA finds this puzzling and is concerned about its implications for the test.

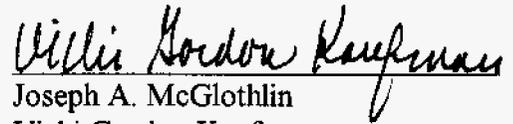
9. Before an accurate and reliable OSS test can be conducted, the parties must know what is to be tested and by what criteria the test will be measured. It makes little sense to have a test without knowing what the performance measures are, but this seems to be what KPMG proposes.

10. FCCA believes that it is *absolutely critical* to establish performance measures and a statistical approach related to such measures *before* testing begins. Otherwise, the entire test may be an exercise in wasted effort. Therefore, FCCA strongly urges that performance measures be put in place at the outset of the test. Such measures should not be unilaterally developed by BellSouth but the ALECs must have input into their development.

WHEREFORE, FCCA requests that the final MTP, include:

a. A commitment to test the GUI as rigorously as EDI and other interfaces;

- b. A commitment to test the UNE P;
- c. Sufficient performance metrics and statistical methods.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Competitive Carriers Association's Comments on Draft Master Test Plan has been furnished by hand delivery(*) or by U.S. Mail this 29th day of October, 1999 to the following:

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